



DuPont Fluoroproducts
22828 NC Highway 87 W
Fayetteville, NC 28306-7332

CERTIFIED MAIL – RETURN RECEIPT REQUESTED

February 18, 2009

Mr. Steven F. Vozzo
NCDENR Division of Air Quality
225 Green Street
Suite 714
Fayetteville, NC 28301-5043

SUBJECT: Miscellaneous Organic Chemical Manufacturing NESHAP (MON)
Compliance Report
Title V Permit Number 03537T34
Facility ID: 0900009

Dear Mr. Vozzo:

Enclosed is the original and one copy of the DuPont Company – Fayetteville Works' Compliance Report for the Miscellaneous Organic Chemical Manufacturing NESHAP (40 CFR Part 63 Subpart FFFF) for the reporting period from May 10, 2008 through December 31, 2008.

If you should have any questions, please call me at 910-678-1155.

Sincerely,

A handwritten signature in black ink, appearing to read "Michael E. Johnson", written over a large, loopy, handwritten "M" that spans across the signature.

Michael E. Johnson
Environmental Manager

Enclosures

cc: U.S. EPA Region 4, Air and EPCRA Enforcement Section, Atlanta, GA

Miscellaneous Organic Chemical Manufacturing NESHAP (MON)
Part 63 Subpart FFFF
Compliance Report
40 CFR 63.2520(e)
Reporting Period from May 10, 2008 through December 31, 2008

40 CFR 63.2520(e)(1) *Company name and address:*

DuPont Company – Fayetteville Works, 22828 NC Hwy 87 W, Fayetteville, NC 28306-7332.

40 CFR 63.2520(e)(2) *Statement by a responsible official with that official's name, title, and signature, certifying the accuracy of the content of the report.*

See Attachment 1 for this certification statement.

40 CFR 63.2520(e)(3) *Date of report and beginning and ending dates of the reporting period.*

The date of this report is February 18, 2009. The reporting period of this report is from May 10, 2008 through December 31, 2008.

40 CFR 63.2520(e)(4) *For each SSM during which excess emissions occur, the compliance report must include records that the procedures specified in your startup, shutdown, and malfunction plan (SSMP) were followed or documentation of actions taken that are not consistent with the SSMP, and include a brief description of each malfunction.*

There are no sources subject to the Subpart FFFF NESHAP for which a startup, shutdown, and malfunction plan (SSMP) is required.

40 CFR 63.2520(e)(5) *The compliance report must contain the information on deviations, as defined in §63.2550, according to paragraphs (e)(5)(i), (ii), (iii), and (iv) of this section.*

A deviation of a work practice standard is described below.

40 CFR 63.2520(e)(5)(i) *If there are no deviations from any emission limit, operating limit or work practice standard specified in this subpart, include a statement that there were no deviations from the emission limits, operating limits, or work practice standards during the reporting period.*

This section is not applicable. A deviation of a work practice standard is described below.

40 CFR 63.2520(e)(5)(ii) *For each deviation from an emission limit, operating limit, and work practice standard that occurs at an affected source where you are not using a continuous monitoring system (CMS) to comply with the emission limit or work practice standard in this subpart, you must include the information in paragraphs (e)(5)(ii)(A) through (C) of this section. This includes periods of SSM.*

A deviation of a work practice standard occurred during the reporting period.

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40 CFR 63.2520(e)(5)(ii)(A) *The total operating time of the affected source during the reporting period.*

A deviation of a work practice standard occurred with two heat exchange systems used to cool process equipment in an MCPU meeting the conditions of §63.2435. During the reporting period, these heat exchange systems each operated 4,272 hours.

40 CFR 63.2520(e)(5)(ii)(B) *Information on the number, duration, and cause of deviations (including unknown cause, if applicable), as applicable, and the corrective action taken.*

Pursuant to 40 CFR 63.2490, any heat exchanger subject to the MON must comply with the work practice standards of 40 CFR 63.104. The DuPont Company – Fayetteville Works' HFPO Process (ID No. NS-A) operates two (2) process heat exchangers that are subject to the MON. To monitor for the presence of a leak in a heat exchanger system, §63.104(b)(5) requires that three (3) samples of both the cooling water entrance to and exit from the heat exchanger be monitored for the presence of speciated hazardous air pollutants ("HAP") monthly for the first six months of operation and quarterly thereafter.

To comply with the monthly heat exchanger monitoring requirement, three samples of both the cooling water entrance and exit were taken at both of the above heat exchangers for the months of May 2008 and June 2008. DuPont personnel believed that these samples satisfied the requirement of monthly triplicate samples at each required monitoring location.

However, when the commercial laboratory received the sets of triplicate samples, their belief was that each set of three samples represented: (1) a single sample for analysis of the specific HAP, (2) a duplicate sample for QA/QC purposes, and (3) a spare sample container in case of breakage of the other two samples. As such, the lab analyzed one or two of the samples from set each instead of the required three.

This error was discovered in July 2008 and DuPont personnel were able to sample and submit the required three samples per monitoring point for that month. Therefore, the two heat exchangers subject to this MON requirement did not have the required number of samples analyzed for either May 2008 or June 2008. This resulted in four permit deviations.

The corrective action taken is that DuPont personnel now submit triplicate samples, triplicate duplicates, and triplicate spare samples of each heat exchanger monitoring location for each monitoring event.

40 CFR 63.2520(e)(5)(ii)(C) *Operating logs of processes with batch vents from batch operations for the day(s) during which the deviation occurred, except operating logs are not required for deviations of the work practice standards for equipment leaks.*

This section is not applicable. This deviation involved work practice standards for equipment leaks.

Miscellaneous Organic Chemical Manufacturing NESHA (MON)

Part 63 Subpart FFFF

Compliance Report

40 CFR 63.2520(e)

Reporting Period from May 10, 2008 through December 31, 2008

40 CFR 63.2520(e)(5)(iii) *For each deviation from an emission limit or operating limit occurring at an affected source where you are using a CMS to comply with an emission limit in this subpart, you must include the information in paragraphs (e)(5)(iii)(A) through (L) of this section. This includes periods of SSM.*

This section is not applicable. This deviation did not involve a continuous monitoring system.

40 CFR 63.2520(e)(5)(iv) *If you documented in your notification of compliance status report that an MCPU has Group 2 batch process vents because the non-reactive HAP is the only HAP and usage is less than 10,000 lb/yr, the total uncontrolled organic HAP emissions from the batch process vents in an MCPU will be less than 1,000 lb/yr for the anticipated number of standard batches, or total uncontrolled hydrogen halide and halogen HAP emissions from all batch process vents and continuous process vents in a process are less than 1,000 lb/yr, include the records associated with each calculation required by §63.2525(e) that exceeds an applicable HAP usage or emissions threshold.*

This section is not applicable. This deviation did not involve a continuous monitoring system.

40 CFR 63.2520(e)(6) *If you use a CEMS, and there were no periods during which it was out-of-control as specified in §63.8(c)(7), include a statement that there were no periods during which the CEMS was out-of-control during the reporting period.*

This section is not applicable. This site does not have a continuous emission monitoring system.

40 CFR 63.2520(e)(7) *Include each new operating scenario which has been operated since the time period covered by the last compliance report and has not been submitted in the notification of compliance status report or a previous compliance report. For each new operating scenario, you must provide verification that the operating conditions for any associated control or treatment device have not been exceeded and that any required calculations and engineering analyses have been performed. For the purposes of this paragraph, a revised operating scenario for an existing process is considered to be a new operating scenario.*

This section is not applicable. This site does not have any new operating scenarios that have been operating since the submittal of the notification of compliance status report.

40 CFR 63.2520(e)(8) *Records of process units added to a PUG as specified in §63.2525(i)(4) and records of primary product redeterminations as specified in §63.2525(i)(5).*

This section is not applicable. This site does not have any process unit groups.

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Reporting Period from May 10, 2008 through December 31, 2008

40 CFR 63.2520(e)(9) *Applicable records and information for periodic reports as specified in referenced subparts F, G, H, SS, UU, WW, and GGG of this part and subpart F of 40 CFR part 65.*

The periodic report for Subpart UU as specified in 40 CFR 63.1039(b) is provided as Attachment 2.

40 CFR 63.2520(e)(10) *Notification of process change.*

This section is not applicable. Since the submittal of the notification of compliance status report, this site has not made any process changes that are not within the scope of an existing operating scenario.

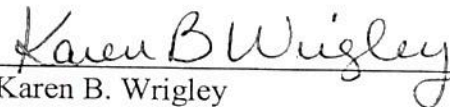
ATTACHMENT 1

**Miscellaneous Organic Chemical Manufacturing NESHA (MON)
Part 63 Subpart FFFF
Compliance Report
40 CFR 63.2520(e)
Reporting Period from May 10, 2008 through December 31, 2008**

Certification of Report Accuracy

As required by 40 CFR 63.2520(e)(2), this document is the statement by a responsible official certifying the accuracy of the content of the subject MON compliance report.

By my signature below, I certify under penalty of law that I have personally examined and am familiar with the information submitted in this document and all attachments and that, based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the information is accurate. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.



Karen B. Wrigley
Plant Manager

February 18, 2009

Date

Miscellaneous Organic Chemical Manufacturing NESHAP (MON)

Part 63 Subpart FFFF

Compliance Report

ATTACHMENT 2

Subpart UU Periodic Report – 40 CFR 63.1039

40 CFR 63.1039(b) *Periodic Reports. The owner or operator shall report the information specified in paragraphs (b)(1) through (b)(8) of this section, as applicable, in the Periodic Report specified in the referencing subpart.*

The information required for the Subpart UU Periodic Report is provided below.

40 CFR 63.1039(b)(1) *For the equipment specified in paragraphs (b)(1)(i) through (b)(1)(v) of this section, report in a summary format by equipment type, the number of components for which leaks were detected and for valves, pumps and connectors show the percent leakers, and the total number of components monitored. Also include the number of leaking components that were not repaired as required by §63.1024, and for valves and connectors, identify the number of components that are determined by §63.1025(c)(3) to be nonrepairable.*

DuPont has chosen to subdivide the applicable process unit or group of process units into four subgroups, namely HFPO, Polymers, VE North, and VE South. See Attachments 3, 4, 5, and 6 for the required summary report of monitored components during the reporting period.

During the reporting period, there were no leaking components that were not repaired as required by §63.1024. During the reporting period, there were no valves and connectors that were determined by §63.1025(c)(3) to be nonrepairable.

40 CFR 63.1039(b)(2) *Where any delay of repair is utilized pursuant to §63.1024(d), report that delay of repair has occurred and report the number of instances of delay of repair.*

During the reporting period, there was no delay of repairs.

40 CFR 63.1039(b)(3) *If applicable, report the valve subgrouping information specified in §63.1025(b)(4)(iv).*

DuPont has chosen to subdivide the valves in the applicable process unit or group of process units into four subgroups, namely HFPO, Polymers, VE North, and VE South. See Attachments 3, 4, 5, and 6 for the specified information.

40 CFR 63.1039(b)(4) *For pressure relief devices in gas and vapor service pursuant to §63.1030(b) and for compressors pursuant to §63.1031(f) that are to be operated at a leak detection instrument reading of less than 500 parts per million, report the results of all monitoring to show compliance conducted within the semiannual reporting period.*

All pressure relief device subject to the Subpart UU regulations are equipped with a rupture disk upstream of the pressure relief device, and pursuant to 40 CFR 1030(e) are exempt from the compliance standard and pressure relief requirements of 40 CFR 1030. The DuPont Company – Fayetteville Works has no compressors subject to Subpart UU requirements.

Miscellaneous Organic Chemical Manufacturing NESHAP (MON)

Part 63 Subpart FFFF

Compliance Report

ATTACHMENT 2

Subpart UU Periodic Report – 40 CFR 63.1039

40 CFR 63.1039(b)(5) *Report, if applicable, the initiation of a monthly monitoring program for valves pursuant to §63.1025(b)(3)(i).*

During the reporting period and following the initial monitoring event, less than 2 monitored valves or 2 monitored percent of the monitored valves were found to be leaking. Therefore the initiation of the monthly monitoring program for valves was not applicable.

40 CFR 63.1039(b)(6) *Report, if applicable, the initiation of a quality improvement program for pumps pursuant to §63.1035.*

During the reporting period, less than 3 monitored pumps or 10 percent of the monitored pumps were found to be leaking. Therefore the initiation of the quality improvement program for pumps was not applicable.

40 CFR 63.1039(b)(7) *Where the alternative means of emissions limitation for batch processes is utilized, report the information listed in §63.1036(f).*

This section is not applicable.

40 CFR 63.1039(b)(8) *Report the information listed in paragraph (a) of this section for the Initial Compliance Status Report for process units or affected facilities with later compliance dates. Report any revisions to items reported in an earlier Initial Compliance Status Report if the method of compliance has changed since the last report.*

The DuPont Company – Fayetteville Works does not have any process units or affected facilities that have later compliance dates with this NESHAP.

ATTACHMENT 3

Periodic Monitoring Summary

Report: R807

Report Date: 2/6/2009 10:01:51AM

Report from: 04/01/2008 To 12/31/2008

Compliance Group:

HFPO

		<u>Leaking</u>	<u>Inspected</u>	<u>Percent Leaking</u>	<u>Late Repairs</u>	<u>Non Reparable</u>
VALVES	APRIL	2	169	1.18	0	0
	MAY	0	160	0.00	0	0
	JUNE	0	0	0.00	0	0
	JULY	0	0	0.00	0	0
	AUGUST	2	160	1.25	0	0
	SEPTEMBER	0	0	0.00	0	0
	OCTOBER	0	0	0.00	0	0
	NOVEMBER	0	160	0.00	0	0
	DECEMBER	0	0	0.00	0	0
PUMPS	APRIL	0	3	0.00	0	0
	MAY	0	3	0.00	0	0
	JUNE	0	3	0.00	0	0
	JULY	0	3	0.00	0	0
	AUGUST	0	3	0.00	0	0
	SEPTEMBER	0	3	0.00	0	0
	OCTOBER	0	3	0.00	0	0
	NOVEMBER	0	3	0.00	0	0
	DECEMBER	0	3	0.00	0	0
COMPRESSORS	APRIL	0	0	0.00	0	0
	MAY	0	0	0.00	0	0
	JUNE	0	0	0.00	0	0
	JULY	0	0	0.00	0	0
	AUGUST	0	0	0.00	0	0
	SEPTEMBER	0	0	0.00	0	0
	OCTOBER	0	0	0.00	0	0
	NOVEMBER	0	0	0.00	0	0
	DECEMBER	0	0	0.00	0	0
AGITATORS	APRIL	0	0	0.00	0	0
	MAY	0	0	0.00	0	0
	JUNE	0	0	0.00	0	0
	JULY	0	0	0.00	0	0
	AUGUST	0	0	0.00	0	0
	SEPTEMBER	0	0	0.00	0	0
	OCTOBER	0	0	0.00	0	0

ATTACHMENT 3

Periodic Monitoring Summary

Report: R807

Report Date: 2/6/2009 10:01:52AM

Report from: 04/01/2008 To 12/31/2008

AGITATORS	NOVEMBER	0	0	0.00	0	0
	DECEMBER	0	0	0.00	0	0
CONNECTORS	APRIL	2	517	0.39	0	0
	MAY	0	2	0.00	0	0
	JUNE	0	0	0.00	0	0
	JULY	0	0	0.00	0	0
	AUGUST	1	1	100.00	0	0
	SEPTEMBER	0	1	0.00	0	0
	OCTOBER	0	0	0.00	0	0
	NOVEMBER	0	0	0.00	0	0
	DECEMBER	0	0	0.00	0	0

ATTACHMENT 4

Periodic Monitoring Summary

Report: R807

Report Date: 2/6/2009 10:01:52AM

Report from: 04/01/2008 To 12/31/2008

Compliance Group:

POLYMERS

		<u>Leaking</u>	<u>Inspected</u>	<u>Percent Leaking</u>	<u>Late Repairs</u>	<u>Non Repairable</u>
VALVES	APRIL	0	65	0.00	0	0
	MAY	0	65	0.00	0	0
	JUNE	0	0	0.00	0	0
	JULY	0	0	0.00	0	0
	AUGUST	0	65	0.00	0	0
	SEPTEMBER	0	0	0.00	0	0
	OCTOBER	0	0	0.00	0	0
	NOVEMBER	0	65	0.00	0	0
	DECEMBER	0	0	0.00	0	0
PUMPS	APRIL	0	2	0.00	0	0
	MAY	1	2	50.00	1	0
	JUNE	0	2	0.00	0	0
	JULY	0	2	0.00	0	0
	AUGUST	0	2	0.00	0	0
	SEPTEMBER	0	2	0.00	0	0
	OCTOBER	0	2	0.00	0	0
	NOVEMBER	0	2	0.00	0	0
	DECEMBER	0	2	0.00	0	0
COMPRESSORS	APRIL	0	0	0.00	0	0
	MAY	0	0	0.00	0	0
	JUNE	0	0	0.00	0	0
	JULY	0	0	0.00	0	0
	AUGUST	0	0	0.00	0	0
	SEPTEMBER	0	0	0.00	0	0
	OCTOBER	0	0	0.00	0	0
	NOVEMBER	0	0	0.00	0	0
	DECEMBER	0	0	0.00	0	0
AGITATORS	APRIL	0	0	0.00	0	0
	MAY	0	0	0.00	0	0
	JUNE	0	0	0.00	0	0
	JULY	0	0	0.00	0	0
	AUGUST	0	0	0.00	0	0
	SEPTEMBER	0	0	0.00	0	0
	OCTOBER	0	0	0.00	0	0

ATTACHMENT 4

Periodic Monitoring Summary

Report: R807

Report Date: 2/6/2009 10:01:52AM

Report from: 04/01/2008 To 12/31/2008

AGITATORS	NOVEMBER	0	0	0.00	0	0
	DECEMBER	0	0	0.00	0	0
CONNECTORS	APRIL	2	341	0.59	0	0
	MAY	0	0	0.00	0	0
	JUNE	0	0	0.00	0	0
	JULY	0	0	0.00	0	0
	AUGUST	0	0	0.00	0	0
	SEPTEMBER	0	0	0.00	0	0
	OCTOBER	0	0	0.00	0	0
	NOVEMBER	0	0	0.00	0	0
	DECEMBER	0	0	0.00	0	0

ATTACHMENT 5

Periodic Monitoring Summary

Report: R807

Report Date: 2/6/2009 10:01:52AM

Report from: 04/01/2008 To 12/31/2008

Compliance Group:

VE NORTH

		<u>Leaking</u>	<u>Inspected</u>	<u>Percent Leaking</u>	<u>Late Repairs</u>	<u>Non Repairable</u>
VALVES	APRIL	0	0	0.00	0	0
	MAY	0	183	0.00	0	0
	JUNE	0	183	0.00	0	0
	JULY	0	0	0.00	0	0
	AUGUST	0	183	0.00	0	0
	SEPTEMBER	0	0	0.00	0	0
	OCTOBER	0	0	0.00	0	0
	NOVEMBER	0	183	0.00	0	0
	DECEMBER	0	0	0.00	0	0
PUMPS	APRIL	0	0	0.00	0	0
	MAY	0	5	0.00	0	0
	JUNE	0	5	0.00	0	0
	JULY	0	5	0.00	0	0
	AUGUST	0	5	0.00	0	0
	SEPTEMBER	0	5	0.00	0	0
	OCTOBER	0	5	0.00	0	0
	NOVEMBER	0	5	0.00	0	0
	DECEMBER	0	5	0.00	0	0
COMPRESSORS	APRIL	0	0	0.00	0	0
	MAY	0	0	0.00	0	0
	JUNE	0	0	0.00	0	0
	JULY	0	0	0.00	0	0
	AUGUST	0	0	0.00	0	0
	SEPTEMBER	0	0	0.00	0	0
	OCTOBER	0	0	0.00	0	0
	NOVEMBER	0	0	0.00	0	0
	DECEMBER	0	0	0.00	0	0
AGITATORS	APRIL	0	0	0.00	0	0
	MAY	0	1	0.00	0	0
	JUNE	0	1	0.00	0	0
	JULY	0	1	0.00	0	0
	AUGUST	0	1	0.00	0	0
	SEPTEMBER	0	1	0.00	0	0
	OCTOBER	0	1	0.00	0	0

ATTACHMENT 5

Periodic Monitoring Summary

Report: R807

Report Date: 2/6/2009 10:01:52AM

Report from: 04/01/2008 To 12/31/2008

AGITATORS	NOVEMBER	0	1	0.00	0	0
	DECEMBER	0	1	0.00	0	0
CONNECTORS	APRIL	0	598	0.00	0	0
	MAY	0	0	0.00	0	0
	JUNE	0	0	0.00	0	0
	JULY	0	0	0.00	0	0
	AUGUST	0	0	0.00	0	0
	SEPTEMBER	0	0	0.00	0	0
	OCTOBER	0	0	0.00	0	0
	NOVEMBER	0	0	0.00	0	0
	DECEMBER	0	0	0.00	0	0

ATTACHMENT 6

Periodic Monitoring Summary

Report: R807

Report Date: 2/6/2009 10:01:52AM

Report from: 04/01/2008 To 12/31/2008

Compliance Group:

VE SOUTH

		<u>Leaking</u>	<u>Inspected</u>	<u>Percent Leaking</u>	<u>Late Repairs</u>	<u>Non Repairable</u>
VALVES	APRIL	0	0	0.00	0	0
	MAY	0	181	0.00	0	0
	JUNE	0	181	0.00	0	0
	JULY	0	0	0.00	0	0
	AUGUST	0	181	0.00	0	0
	SEPTEMBER	0	0	0.00	0	0
	OCTOBER	0	0	0.00	0	0
	NOVEMBER	0	181	0.00	0	0
	DECEMBER	0	0	0.00	0	0
PUMPS	APRIL	0	0	0.00	0	0
	MAY	0	6	0.00	0	0
	JUNE	0	6	0.00	0	0
	JULY	0	6	0.00	0	0
	AUGUST	0	6	0.00	0	0
	SEPTEMBER	0	6	0.00	0	0
	OCTOBER	0	6	0.00	0	0
	NOVEMBER	0	6	0.00	0	0
	DECEMBER	0	6	0.00	0	0
COMPRESSORS	APRIL	0	0	0.00	0	0
	MAY	0	0	0.00	0	0
	JUNE	0	0	0.00	0	0
	JULY	0	0	0.00	0	0
	AUGUST	0	0	0.00	0	0
	SEPTEMBER	0	0	0.00	0	0
	OCTOBER	0	0	0.00	0	0
	NOVEMBER	0	0	0.00	0	0
	DECEMBER	0	0	0.00	0	0
AGITATORS	APRIL	0	0	0.00	0	0
	MAY	0	0	0.00	0	0
	JUNE	0	0	0.00	0	0
	JULY	0	0	0.00	0	0
	AUGUST	0	0	0.00	0	0
	SEPTEMBER	0	0	0.00	0	0
	OCTOBER	0	0	0.00	0	0

ATTACHMENT 6

Periodic Monitoring Summary

Report: R807

Report Date: 2/6/2009

10:01:52AM

Report from: 04/01/2008 To 12/31/2008

AGITATORS	NOVEMBER	0	0	0.00	0	0
	DECEMBER	0	0	0.00	0	0
CONNECTORS	APRIL	0	0	0.00	0	0
	MAY	0	697	0.00	0	0
	JUNE	0	0	0.00	0	0
	JULY	0	0	0.00	0	0
	AUGUST	0	0	0.00	0	0
	SEPTEMBER	0	0	0.00	0	0
	OCTOBER	0	0	0.00	0	0
	NOVEMBER	0	0	0.00	0	0
	DECEMBER	0	0	0.00	0	0